

## CRIMINAL COMPLAINT

## Alleged Offense:

I, Special Agent Rocky Ductan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Beginning on a date unknown but no later than in or about August of 2022 and continuing until in or about January of 2023, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants **Leroy Marquee Jones, also known as "Aladdin" and Christopher Antwuan George,** along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A), namely to distribute and possess with intent to distribute at least 400 grams of fentanyl a schedule II controlled substance, in violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A).

## Probable Cause:

I, SA Rocky Ductan, affiant and under oath, duly state that I am a Special Agent with the Drug Enforcement Administration (DEA), assigned to the DEA Task Force,

Group 1, Fort Worth District Office (FWDO). The statements set forth in this affidavit are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information in this case.

- 1. Agents with the DEA have been investigating the drug-trafficking activities of Leroy Marquee Jones, also known as *Aladdin* and known and unknown members of his drug-trafficking organization (The Jones DTO). This investigation revealed The Jones DTO traffics in methamphetamine, heroin, fentanyl, cocaine, and marijuana throughout the Fort Worth, Texas, area.
- 2. Since the beginning of August 2022, Agents and TFOs with the DEA received information from 3 sources of information (SOI) indicating that **Leroy Marquee Jones a.k.a.** "Aladdin" was a multi-ounce to multi-kilo gram drug distributor operating in the "stop six" area of Fort Worth. Each SOI stated that they have personally purchased varying amounts of methamphetamine, fentanyl pills, and cocaine from **Leroy Jones**. Two of the SOI's were shown a digital photo that depicted **Leroy Jones** and both SOI's positively identified **Leroy Jones** as the source of supply known to them as *Aladdin*. The SOI's also identified two phone numbers associated with **Leroy Jones** used to facilitate drug transactions.
- 3. Based on information corroborated from each SOI, Agents and TFOs with the DEA were able apply for and receive federally authorized GPS location data on both phones believed to be in the control and possession of **Leroy Jones** and co-conspirators used to facilitate the drug trafficking operation. Agents monitored the GPS location data

of the phones and conducted physical surveillance simultaneously. The GPS location information led to the identification of three locations believed to be operated by **Leroy Jones.** The locations are: XXXX Crockett Street, Apt XXX, Fort Worth, Texas 76107,

XXXX RW. Bivens Lane, Fort Worth, Texas, 76105 and XXXX Effic Street, Fort Worth

Texas 76105.

- 4. During the course of the investigation agents obtained federal search warrants for each of the aforementioned residences which were executed on January 19, 2023. The search of the residences yielded approximately: 400 grams of suspected methamphetamine, 500 grams of suspected fentanyl, 16 firearms, varying amounts of other illicit substances, and a large amount of U currency. The suspected methamphetamine and fentanyl were field tested and were both presumptive positive for methamphetamine and fentanyl.
- Jones is the head of a DTO operating primarily in the eastern Fort Worth area.

  Furthermore, George stated that he was employed by Jones and another co-conspirator to safeguard the drugs and proceeds of drug distribution. George referred to himself as "security" for the drug trap locations. George stated that he was compensated 100 dollars a night to safeguard the drug distribution location for Jones and other co-conspirators.
- 6. Agents conducted a brief analysis of a cellular device associated with **Jones** located inside one of the drug distribution locations pursuant to a federal search warrant.

  Agents observed evidence of drug distribution on behalf **Jones** in the device. In a

recent SMS conversation during the month of January, an unknown individual contacted this device attempting to contact Jones or Aladdin. The individual exhibited photographs of suspected black tar heroin and identifies the substance as "black". The individual further negotiated a price discrepancy of previous drug sales with Jones during the times of the conspiracy.

Accordingly, based on the foregoing, there is probable cause to believe that 7. each of the above-named defendants, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to possess with intent to distribute at least 400 grams of fentanyl in violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A).

Administration |

Sworn to before me, and subscribed in my presence on **ZO** day of January, 2023 at 10:27 ......./p.m., in Fort Worth, Texa

JEFFREY I

UNITED STATES MAGISTRATE JUDGE